

United States Bankruptcy Court
District of Massachusetts

Michelle Martinez
Manuel Martinez, Jr.

Case No. 13-41132-MSH
Chapter 13

Debtor(s)

MOTION TO CONVERT CASE FROM CHAPTER 13 TO CHAPTER 7

Pursuant to 11 U.S.C. § 1307(a), the above-named Debtor(s) requests that this court enter an Order converting this case under Chapter 13 to a case under Chapter 7 of the Bankruptcy code (title 11 of the United States Code), on the grounds set forth below.

1. On April 30, 2013, the above-named Debtor(s) filed a Voluntary Petition under Chapter 13 of the Bankruptcy Code.
2. This case has not been previously converted.

WHEREFORE, Debtor(s) prays for an Order converting this case under Chapter 13 to Chapter 7 of the Bankruptcy Code.

Respectfully Submitted,

Michelle and Manuel Martinez,
By their Attorney,

/s/ Matthew T. Desrochers
Matthew T. Desrochers
BBO #644504
274 Main Street, Suite 208
Reading, MA 01867
(781) 279-1822
mssslaw@yahoo.com

May 28, 2013

CERTIFICATE OF SERVICE

I, **Matthew T. Desrochers**, state that on May 28, 2013, I electronically filed the foregoing Motion to Convert Case to a Chapter 7 with the United States Bankruptcy Court for the District of Massachusetts, using the CM/EFC system. I served the foregoing document on the following Participants:

By electronic mail:

Office of the US Trustee
Denise Pappalardo, Chapter 13 Trustee
Julie A. Ranieri on behalf of Creditor Digital Federal Credit Union

I further state that a copy of the foregoing motion was mailed by first class mail upon the following:

Mr. and Mrs. Martinez, 4 Taft Street, Lawrence, MA
Attached list of creditors

/s/ Matthew T. Desrochers
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